

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Alexandria Division**

Intersections Inc. and Net Enforcers, Inc.,

Plaintiffs,

v.

Joseph C. Loomis and Jenni M. Loomis,

Defendants.

Civil Action No. 1:09CV597 (LMB/TCB)

**MEMORANDUM IN SUPPORT OF JOINT MOTION
TO TEMPORARILY STAY ACTION**

Plaintiffs, Intersections Inc. (“Intersections”) and Net Enforcers, Inc. (“NEI”, and together with Intersections, “Plaintiffs”) and Defendants Joseph C. Loomis and Jenni M. Loomis (collectively, “Defendants”) hereby submit this Memorandum in support of their Joint Motion to Temporarily Stay Action pending determination of the motion to approve settlement agreement filed by the parties in the United States Bankruptcy Court for the District of Arizona (the “Bankruptcy Court”).

On April 6, 2011, the Plaintiffs, the Defendants and various other parties related to the Defendants entered into a Settlement Agreement. A copy of the Settlement Agreement is attached as Exhibit A. On April 7, 2011, the parties filed a motion with the United States Bankruptcy Court for the District of Arizona seeking approval of the settlement. A copy of the motion is attached hereto as Exhibit B. The Settlement Agreement fully resolves all claims and counterclaims in this action. The parties anticipate that the settlement will be approved by the Bankruptcy Court, and that the actions to be taken pursuant to the settlement will be completed,

by June 30, 2011. Accordingly, the parties request an immediate stay of this action until June 30, 2011.

The parties have filed this motion in a good faith effort to assist in the efficient administration of this action. A stay is warranted to avoid an unnecessary waste of judicial resources and unnecessary expense to the parties.

Dated: April 7, 2011

Respectfully submitted,

By: /s/

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CERTIFICATE OF SERVICE

I hereby certify that on the 7th day of April, 2011, I caused the foregoing Memorandum in Support of Joint Motion to Temporarily Stay Action to be electronically filed with the Clerk of the Court using the CM/ECF system, which will then send a notification of such filing (NEF) to the following:

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